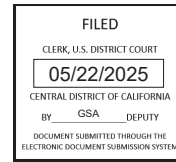


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*In Propria Persona*



**UNITED STATES DISTRICT COURT FOR  
THE CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

**TODD R. G. HILL, et al,**

**Plaintiffs**

**vs.**

**THE BOARD OF DIRECTORS,  
OFFICERS AND AGENTS AND  
INDIVIDUALS OF THE PEOPLES  
COLLEGE OF LAW, et al.,**

**Defendants.**

**CIVIL ACTION NO. 2:23-cv-01298-JLS-BFM**

**The Hon. Josephine L. Staton**  
Courtroom 8A, 8th Floor

**Magistrate Judge Brianna Fuller Mircheff**  
Courtroom 780, 7th Floor

**NOTICE OF ERRATA AND SUBSTITUTION  
OF CORRECTED PROPOSED FIFTH  
AMENDED COMPLAINT PURSUANT TO  
DKT. 311**

**NO ORAL ARGUMENT REQUESTED**

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**NOTICE OF ERRATA AND SUBSTITUTION OF CORRECTED PROPOSED FIFTH AMENDED  
COMPLAINT PURSUANT TO DKT. 311**

CASE 2:23-CV-01298-JLS-BFM

**NOTICE OF ERRATA AND SUBSTITUTION OF CORRECTED PROPOSED FIFTH AMENDED COMPLAINT PURSUANT TO DKT. 311**

TO THE HONORABLE COURT AND ALL PARTIES OF RECORD:

Plaintiff respectfully submits this Notice of Errata and Substitution to correct an inadvertent drafting error in the version of the Proposed Fifth Amended Complaint originally submitted with Dkt. 310. This corrected version is submitted in compliance with the Court's Order dated May 22, 2025 (Dkt. 311), which directed Plaintiff to file a redline comparison of the operative Fourth Amended Complaint and the Proposed Fifth Amended Complaint.

Upon preparing the required redline, Plaintiff discovered that the version previously filed with Dkt. 310 had inadvertently been generated from an outdated working draft. As a result, that version erroneously retained references to certain individuals who had been previously dismissed with prejudice in connection with the Fourth Amended Complaint, including Natalie Leonard, Audrey Ching, Leah Wilson, and others affiliated with the State Bar of California.

Plaintiff affirms that no claims are asserted against these individuals in the corrected Proposed Fifth Amended Complaint submitted herewith. All references to such individuals are limited to their factual and regulatory involvement in the matters at issue and do not seek to reintroduce claims previously dismissed by the Court. The corrected version is otherwise identical in substance to the version previously submitted, except for the removal of those inadvertent references.

Due to file size constraints, Plaintiff will submit the required redline version comparing the operative Fourth Amended Complaint to this corrected Proposed Fifth Amended Complaint in a

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**NOTICE OF ERRATA AND SUBSTITUTION OF CORRECTED PROPOSED FIFTH AMENDED COMPLAINT PURSUANT TO DKT. 311**

CASE 2:23-CV-01298-JLS-BFM

1 separate filing, to follow promptly and in advance of the May 26, 2025 deadline established by the  
2 Court.  
3

4 The corrected version is consistent with the operative Fourth Amended Complaint currently on  
5 file and reflects the intended structure of the proposed amendments. Due to file size constraints,  
6 Plaintiff will submit the required redline version comparing the operative Fourth Amended  
7 Complaint to this corrected Proposed Fifth Amended Complaint in a separate filing, to follow  
8 promptly and in advance of the May 26, 2025 deadline established by the Court.  
9  
10

11 This correction is submitted in good faith to ensure the accuracy and integrity of the record and to  
12 facilitate the Court's evaluation of Plaintiff's pending request for leave to amend.  
13

14 Respectfully submitted,

15 Dated: May 22, 2025  
16

17  
18   
19  
20

21 Todd R. G. Hill  
22 Plaintiff, Pro Se

23 **STATEMENT OF COMPLIANCE WITH LOCAL RULE 11-6.1**  
24

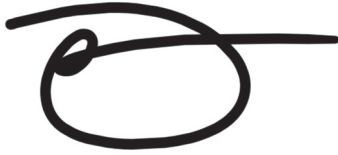
25 The undersigned party certifies that this brief contains 368 words, which complies with the 7,000-  
26 word limit of L.R. 11-6.1.

27 Respectfully submitted,  
28

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**NOTICE OF ERRATA AND SUBSTITUTION OF CORRECTED PROPOSED FIFTH AMENDED  
COMPLAINT PURSUANT TO DKT. 311**

CASE 2:23-CV-01298-JLS-BFM



May 22, 2025  
Todd R.G. Hill  
Plaintiff, in Propria Persona

### Plaintiff's Proof of Service

This section confirms that all necessary documents will be properly served pursuant to L.R. 5-3.2.1 Service. This document will be/has been electronically filed. The electronic filing of a document causes a "Notice of Electronic Filing" ("NEF") to be automatically generated by the CM/ECF System and sent by e-mail to: (1) all attorneys who have appeared in the case in this Court and (2) all pro se parties who have been granted leave to file documents electronically in the case pursuant to L.R. 5-4.1.1 or who have appeared in the case and are registered to receive service through the CM/ECF System pursuant to L.R. 5-3.2.2. Unless service is governed by Fed. R. Civ. P. 4 or L.R. 79-5.3, service with this electronic NEF will constitute service pursuant to the Federal Rules of Civil Procedure, and the NEF itself will constitute proof of service for individuals so served.

Respectfully submitted,



May 22, 2025  
Todd R.G. Hill  
Plaintiff, in Propria Persona

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**NOTICE OF ERRATA AND SUBSTITUTION OF CORRECTED PROPOSED FIFTH AMENDED  
COMPLAINT PURSUANT TO DKT. 311**

CASE 2:23-CV-01298-JLS-BFM